

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

SUPPLEMENT TO PLAINTIFFS’ MOTION FOR LEAVE TO FILE UNDER SEAL

On May 17, 2024, Plaintiffs filed their Opposition to Defendant’s Motion for Summary Judgment, ECF No. 656, and moved this Court to seal certain exhibits attached thereto, ECF No. 667. Plaintiffs’ Exhibit 12—excerpts of a deposition of an employee of a non-party—was filed publicly with redactions at that time. ECF No. 656-13. Counsel for that non-party recently notified Plaintiffs that it was the non-party’s intent to designate the entirety of the deposition transcript as highly confidential under the operative protective order, ECF No. 203. Therefore, pursuant to Local Rule 5(C), and for the reasons set forth in Plaintiffs’ Motion to Seal and associated memorandum at ECF Nos. 667-68, Plaintiffs respectfully request that the Court maintain Plaintiffs’ Exhibit 12 fully under seal until June 14, 2024, at which time the non-party will provide its bases, if any, for continued sealing in response to Plaintiffs’ Motion to Seal, ECF No. 667.¹ *See* ECF No. 728.

¹ Counsel for the United States has contacted the Clerk’s Office to request that this particular exhibit be sealed on the docket so that the associated non-party has the opportunity to advocate for continued sealing through a filing on or before June 14, 2024.

Dated: June 7, 2024

Respectfully submitted,

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